

CARMEN PLAZA DE JENNINGS (SBN 091742)
JAYNE BENZ CHIPMAN (SBN 140048)
PLAZA DE JENNINGS & CHIPMAN LLP
1000 Marina Village Parkway, Suite 110
Alameda, CA 94501
Telephone: (510) 319-7080
Attorneys for Defendants THE FOOTHILL-DE ANZA
COMMUNITY COLLEGE DISTRICT, et al.

NEAL S. ZASLAVSKY (SBN 277543)
LAW OFFICE OF NEAL S. ZASLAVSKY
A PROFESSIONAL CORPORATION
8335 Sunset Boulevard, Suite 101
West Hollywood, CA 90069
Telephone: (323) 389-1881

MICHAEL THAD ALLEN
admitted *pro hac vice*
ALLEN HARRIS PLLC
PO Box 404
Quaker Hill, CT 06357
Telephone: (860) 772-4738
Attorneys For Plaintiff TABIA LEE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TABIA LEE,

Plaintiff,

vs.

THE FOOTHILL-DE ANZA
COMMUNITY COLLEGE DISTRICT,
DE ANZA COLLEGE, PATRICK J.
AHRENS, LAURA CASAS, PEARL
CHENG, PETER LANDSBERGER, LEE
LAMBERT, and GILBERT WONG, in their
official capacities; CHRISTINA
ESPINOSA-PIEB, in her official and
individual capacities; ALICIA CORTEZ,
LYDIA HEARN, LLOYD A. HOLMES,
and THOMAS RAY, in their individual
capacities,

Defendant(s).

Case No. 5:23-CV-03418-EKL

**JOINT PROPOSED SCHEDULING
ORDER**

The parties to the above-entitled action jointly submit this JOINT PROPOSED

1 SCHEDULING ORDER per the Court's December 4, 2024 Order (ECF No. 69).

2
3 The parties propose the following schedule consistent with the Court's Standing Order
4 For Civil Cases (August 16, 2024), Section VI "Case Management Conferences." Per the
5 Court at the December 4, 2024 Initial Case Management Conference, the parties may go back
6 to the Court to request modification of the following dates as appropriate following the Court's
7 ruling on the pending Motion to Dismiss which is anticipated in mid-January 2025:

- 8 • Motions to Amend Pleadings Or To Add Parties: None anticipated given the
9 stage of pleadings.
- 10 • Deadline For Each Party To File ADR Certification Form: January 31, 2025
- 11 • Rule 26(f) Meet And Confer Deadline: January 31, 2025
- 12 • Last Day For Parties To Exchange Rule 26(a) Initial Disclosures: March 14,
13 2025
- 14 • Final Case Management Conference: June 4, 2025
- 15 • Close of Fact Discovery: October 1, 2025
- 16 • Deadline to Complete ADR: October 4, 2025
- 17 • Close of Expert Discovery: December 31, 2025
- 18 • Close of Briefing on Summary Judgment and Daubert Motions: March 12,
19 2026, with hearings scheduled four (4) weeks after the final briefs are submitted as
20 permitted by the Court's motion calendar.
- 21 • Joint Pretrial Statement: June 24, 2026
- 22 • Pretrial Conference: July 8, 2026
- 23 • Trial: To begin August 4, 2026 as the Court's trial calendar permits. The
24 parties propose that they submit a Supplemental Joint Scheduling Order by January 31,
25 2025 with the anticipated length of trial, to be determined following receipt of the
26 Court's Order on Defendants' pending Motion to Dismiss the Second Amended
27 Complaint.
- 28

Dated: January __6__, 2025

PLAZA DE JENNINGS & CHIPMAN LLP

By: /s/ Jayne Benz Chipman

Carmen Plaza de Jennings
Jayne Benz Chipman

Attorneys for Defendants
THE FOOTHILL-DE ANZA
COMMUNITY COLLEGE DISTRICT,
DE ANZA COLLEGE, PATRICK J.
AHRENS, LAURA CASAS, PEARL CHENG,
PETER LANDSBERGER, LEE LAMBERT,
and GILBERT WONG, in their official capacities; CHRISTINA
ESPINOSA-PIEB, in her official and individual capacities;
ALICIA CORTEZ, LYDIA HEARN, LLOYD A. HOLMES,
and THOMAS RAY, in their individual capacities,

Dated: January __6__, 2025

ALLEN HARRIS PLLC

By: /s/ Michael Thad Allen

Michael Thad Allen

Attorneys for Plaintiff
TABIA LEE

CASE MANAGEMENT ORDER

The above JOINT PROPOSED SCHEDULING ORDER is approved as the
SCHEDULING ORDER for this case and all parties shall comply with its provisions. [In
addition, the Court makes the further orders stated below:]

IT IS SO ORDERED.

Dated:

Eumi K. Lee

UNITED STATES DISTRICT JUDGE